

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

LAURIE GARLAND, an individual,

Plaintiff,

v.

STATE OF OKLAHOMA EX REL.  
OKLAHOMA DEPARTMENT OF  
CORRECTIONS, ET AL.,

Defendants.

**Case No. CIV-20-306-RAW**

**DEFENDANT SHARON MCCOY'S RESPONSES AND OBJECTIONS  
TO PLAINTIFF'S INTERROGATORIES, REQUESTS FOR  
PRODUCTION AND REQUESTS FOR ADMISSIONS**

Defendant Sharon McCoy, by and through Assistant Attorney General Kari Y. Hawkins, and pursuant to Fed. R. Civ. P. 33, 34 and 36, submit the following responses and objections to Plaintiff's Requests for Admissions.

**GENERAL RESPONSES AND OBJECTIONS**

1. Each of the following responses is made without waiving any objections Defendant may have with respect to the subsequent use of these responses or any documents referred to herein.

2. Defendant specifically reserves the following: (1) all questions and objections as to the competency, relevance, materiality and admissibility of responses contained herein; (2) the right to object to the use of responses set forth herein in any subsequent suit or proceeding in this action, on any or all of the foregoing grounds or on any other proper grounds; (3) the right to object to other discovery procedures involving or relating to responses contained herein, including but not limited to the number of Interrogatories, Requests for Production of Documents, and Requests for Admission

**RESPONSE TO REQUEST FOR PRODUCTION NO. 13:** Defendant has no documents responsive to this request.

**REQUEST FOR PRODUCTION NO. 14:** Produce all documents you intend to use at Trial.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 14:** Defendant has no documents responsive to this request. Furthermore, exhibits will be identified and produced in accordance with the Court's scheduling order.

**REQUEST FOR PRODUCTION NO. 15:** Produce all expert reports and CV:

**RESPONSE TO REQUEST FOR PRODUCTION NO. 15:** Defendant has no documents responsive to this request.

**RESPONSES TO REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 1:** Do you Admit that you were warden of the Eddie Warrior prison facility, in Muskogee Oklahoma during Plaintiff's incidents.

**RESPONSE TO REQUEST FOR ADMISSION NO. 1:** Defendant admits only that she was Warden of the Eddie Warrior Correctional Center until her transfer to Jess Dunn Correctional Center on April 1, 2019.

**REQUEST FOR ADMISSION NO. 2:** Do you admit that Plaintiff was sexually assaulted while incarcerated at Eddie Warrior prison facility, in Muskogee Oklahoma.

**RESPONSE TO REQUEST FOR ADMISSION NO. 2:** Defendant objects to this Request on the basis that it calls for a legal conclusion. Defendant further objects to this request to the extent that it assumes facts that have not been established. Subject to and without waiving said objection, this request assumes or contemplates the Defendant has personal, firsthand, individual or independent

protected from sexual advancement and assault by Defendant RedEagle?

**RESPONSE TO REQUEST FOR ADMISSION NO. 5:** Defendant objects to this Request on the basis that it calls for a legal conclusion. Defendant further objects to this request to the extent that it assumes facts that have not been established. Subject to and without waiving said objection, this request assumes or contemplates the Defendant has personal, firsthand, individual or independent knowledge of facts that she does not possess, and Defendant therefore lacks information sufficient to admit or deny this request.

Respectfully submitted,

/s/ Kari Y. Hawkins

**KARI Y. HAWKINS, OBA #19824**

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*Attorney for Defendants McCoy, Lewis and Mooneyham*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of September, 2021, a true and correct copy of the above and foregoing was mailed by U.S. Mail, postage prepaid, to:

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/s/Kari Y. Hawkins

Kari Y. Hawkins